

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF ILLINOIS**

In re: )  
 )  
STC Inc., )  
 )  
Debtor. )  
 )  
\_\_\_\_\_) Adversary Proceeding No. 14-04039-lkg  
STC Inc., )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
GLOBAL TRAFFIC TECHNOLOGIES, LLC )  
 )  
and )  
 )  
COMMUNITY FIRST BANK OF THE )  
HEARTLAND )  
 )  
and )  
 )  
RODNEY KRIS MORGAN )  
 )  
and )  
 )  
KM ENTERPRISES, INC., )  
 )  
Defendants. )  
 )

Chapter 11  
Case No. 14-41014

**MOTION TO WITHDRAW THE  
REFERENCE**

Pursuant to 28 U.S.C. § 157(d), Rule 5011 of the Federal Rules of Bankruptcy Procedure, and S.D. Ill. L.R. 5011-1, Defendant Global Traffic Technologies, LLC (“GTT”) moves for entry of an order withdrawing the reference of the above-captioned adversary proceeding (“Adversary Proceeding”) from the United States Bankruptcy Court for the Southern District of Illinois to the United States District Court for the Southern District of Illinois (“District Court”) so that it may be adjudicated within the bounds of constitutional authority and formally coordinated with

similar proceedings commenced in District Court, specifically, *Global Traffic Technologies, LLC, v. KM Enterprises, Inc. et al*, Case No. 3:14-mc-00065-MJR-DGW (registering GTT's more than \$8.5 million judgment in the District Court and serving citations to discover assets of KM Enterprises, Inc. and Rodney Kris Morgan held by STC, Inc.).

**Relief Requested**

GTT requests that, pursuant to 28 U.S.C. § 157(d), the District Court withdraw the reference of this Adversary Proceeding to the Bankruptcy Court.

Dated: December 29, 2014

Respectfully submitted,

/s/ George R. Mesires

George R. Mesires (IL Bar No. 6276952)

Faegre Baker Daniels LLP

311 South Wacker Drive, Suite 4300

Chicago, IL 60606

Telephone: (312) 212-6500

Facsimile: (312) 212-6501

Email: [george.mesires@FaegreBD.com](mailto:george.mesires@FaegreBD.com)

*Attorney for Global Traffic Technologies, LLC*

**UNSWORN CERTIFICATE OF SERVICE**

I, Donna R. Oberg, declare under penalty of perjury that on December 29, 2014, the foregoing Motion to Withdraw the Reference of Defendant Global Traffic Technologies, LLC was served via ECF by the Bankruptcy Court in the Southern District of Illinois on the persons who requested electronic service in this case.

Executed on: December 29, 2014

Signed: /s/ Donna R. Oberg